

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

LOYALTY CONVERSION SYSTEMS	§	
CORPORATION	§	
	§	Case No. 2:13-CV-655-JRG
Plaintiff,	§	(LEAD CASE)
	§	
v.	§	Jury Trial Demanded
	§	
AMERICAN AIRLINES, INC., ET AL.	§	
	§	
Defendants.	§	

**PLAINTIFF'S UNOPPOSED MOTION FOR EXTENSION OF TIME
TO REPLY TO DEFENDANTS SOUTHWEST AIRLINES CO. AND HAWAIIAN
AIRLINES, INC.'S RESPONSE TO MOTION FOR PRELIMINARY INJUNCTION**

Plaintiff Loyalty Conversion Systems Corporation (“Loyalty Conversion”) hereby respectfully moves for an extension of time to reply to Defendants Southwest Airlines Co., (“Southwest”) and Hawaiian Airlines, Inc.’s (“Hawaiian Airlines”) Response to Motion for Preliminary Injunction filed on June 30, 2014 [Doc. No. 92] (the “Motion”). In support thereof, Plaintiff would show the Court the following:

Loyalty Conversion’s reply to the Motion is currently due on July 10, 2014. The present Motion requests an extension until and including July 17, 2014. Counsel for the parties have conferred with respect to this Motion, and counsel for Defendants have indicated Defendants are unopposed to the relief sought in this Motion. The extension is not sought for purposes of delay but so that justice may be done.

Dated: July 9, 2014

Respectfully submitted,

By: /s/ Andrew G. DiNovo
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ATTORNEYS FOR PLAINTIFF
LOYALTY CONVERSION SYSTEMS
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CERTIFICATE OF CONFERENCE

Pursuant to Local Rule CV-7(i), the undersigned certifies that counsel have complied with the meet-and-confer requirements of Local Rule CV-7(h), and that Defendants are unopposed to the foregoing motion.

/s/ Andrew G. DiNovo
Andrew G. DiNovo

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, this motion was served on all counsel, who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(A). Pursuant to Fed. R. Civ. P. 5(d) and Local Rule CV-5(d) and (e), all other counsel of record not deemed to have consented to electronic service were served with a true ad correct copy of the foregoing by email, on this the 9th day of July 2014.

/s/ Andrew G. DiNovo
Andrew G. DiNovo